

DO/FFO  
CORRESPONDENCE  
INCOMING LETTER

009970

CONTROL NO

FILE CODE

5400

2, 1995

95-RF-06646



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SILVERMAN M		
KLEIN K		
ANDERSON T		
APRIL B		
BROCKMAN D		
BUTLER R		
CANNODE G		
DAN C		
DAY M		
DUFFY G		
GRETHEL T		
HARGREAVES M		
HARTMAN J.K.		
HEIDEMANN K		
KAROL M.S.		
KARPATKIN J		
KERRIDGE J		
LEWIS L		
LINDSAY D		
MARQUEZ S		
MCCORMICK M		
McEAHERN P		
MELBERG T		
NEWTON R		
OLINGER S		
PIETSCH E		
ROBERSON J	X	X
RUSCITTO D		
SARGENT D		
SCHLAG L		
SIMONSON D		
SMITH L		
STEWART D		
TOWER S		
WAGNER P		
WEIS M		
WIENAND J		
YARBOROUGH J		

Roberson, Assistant Manager  
Mental Restoration  
FO

USE TO COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
) COMMENTS ON THE POLYCHLORINATED BIPHENYLS (PCBs) SAMPLING  
ALYSIS PLAN (SAP) - TGH-236-95

Sampling and Analysis Plan for the Removal of PCBs has been revised to incorporate  
is made by CDPHE in the letter dated August 11, 1995, from CDPHE to the Department  
y, Rocky Flats Field Office (DOE, RFFO) Attached is a draft transmittal letter to Joe  
in of CDPHE The comment incorporation was approved verbally by Melani Arai on  
8, 1995 The changes are as follows

on 2 1 of the SAP now reads "If samples taken during excavation exceed 10 ppm  
weight, additional soil will be removed in 12 inch lifts at the discretion of the Project  
The extent of soil removal will be based on the field sample results "

on 5 3 2, Data Quality Objectives, has been clarified in all the pertinent categories to  
that 10 ppm PCBs by weight is the field cleanup target used to control excavation  
and 25 ppm PCBs by weight is the level that must be met for cleanup confirmation  
nges read

the Problem:

3) I "determine PCB levels in the field above 10 ppm to guide excavation activities."

Ify the Decision:

2) I "Has the excavation removed PCB contamination in accordance with Section 2 1 of  
the SAP, as analyzed on site using EPA SW-846 Draft Method 4020?

- a) Confirmation sampling can begin at this site
- b) Excavation must continue "

Ify the Inputs to the Decision:

1) I. "To evaluate the problem, the planning team must collect samples of soil from the  
excavation site during removal activities following every 12" of soil removal, and subject  
them to an immunoassay test to analyze for PCBs. Either a semi-quantitative (>10 ppm  
or <10 ppm PCBs as compared to a 10 ppm standard) or a quantitative analysis will be  
ufficient "

lop a Decision Rule:

2) I "The action level for this problem is 10 ppm PCBs "

3) I "If the PCB concentration in the soil is above 10 ppm, then the excavation will  
continue at the discretion of the Project Manager "

D/E  
RECORDS

NOTES

RECEIVED by ADDRESSEE  
BY 1/4 DATE

Company, LLC  
Rocky Flats Environmental Technology Site in the  
Box 404 Golden, Colorado 80402-0404

ADMINISTRATIVE

SW-A-004770



August 22, 1995

95-RF-06646

Jessie M Roberson, Assistant Manager  
Environmental Restoration  
DOE, RFFO

**RESPONSE TO COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
(CDPHE) COMMENTS ON THE POLYCHLORINATED BIPHENYLS (PCBs) SAMPLING  
AND ANALYSIS PLAN (SAP) – TGH-236-95**

The Sampling and Analysis Plan for the Removal of PCBs has been revised to incorporate comments made by CDPHE in the letter dated August 11, 1995, from CDPHE to the Department of Energy, Rocky Flats Field Office (DOE, RFFO). Attached is a draft transmittal letter to Joe Schieffelin of CDPHE. The comment incorporation was approved verbally by Melani Arai on August 18, 1995. The changes are as follows:

1. Section 2.1 of the SAP now reads: "If samples taken during excavation exceed 10 ppm PCBs by weight, additional soil will be removed in 12 inch lifts at the discretion of the Project Manager. The extent of soil removal will be based on the field sample results."

2. Section 5.3.2, Data Quality Objectives, has been clarified in all the pertinent categories to describe that 10 ppm PCBs by weight is the field cleanup target used to control excavation activities and 25 ppm PCBs by weight is the level that must be met for cleanup confirmation. The changes read:

**State the Problem:**

(3) I "determine PCB levels in the field above 10 ppm to guide excavation activities."

**Identify the Decision:**

(2) I "Has the excavation removed PCB contamination in accordance with Section 2.1 of the SAP, as analyzed on site using EPA SW-846 Draft Method 4020?"

- a) Confirmation sampling can begin at this site
- b) Excavation must continue "

**Identify the Inputs to the Decision:**

(1) I "To evaluate the problem, the planning team must collect samples of soil from the excavation site during removal activities following every 12" of soil removal, and subject them to an immunoassay test to analyze for PCBs. Either a semi-quantitative (>10 ppm or <10 ppm PCBs as compared to a 10 ppm standard) or a quantitative analysis will be sufficient."

**Develop a Decision Rule:**

- (2) I "The action level for this problem is 10 ppm PCBs."
- (3) I "If the PCB concentration in the soil is above 10 ppm, then the excavation will continue at the discretion of the Project Manager."

Kaiser-Hill Company, L L C

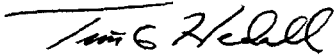
Courier Address: Rocky Flats Environmental Technology Site, State Hwy 93 and Cactus, Rocky Flats, CO 80007 • 303 966 7000

Mailing Address: P O Box 464, Golden, Colorado 80402-0464

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J M. Roberson  
95-RF-06646  
August 22, 1995  
Page 2

The Final SAP used to guide field work will incorporate these comments Please contact  
Ann Sieben at X9886 with any further questions or comments



T G Hedahl, Director  
ER/WM&I Operations  
Kaiser-Hill Company, L.L.C

AKS bag

Attachment  
As Stated

Org and 1 cc - J M Roberson



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Joe Schieffelin  
Colorado Department of Public Health and Environment

**RESPONSE TO COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT (CDPHE) COMMENTS ON THE POLYCHLORINATED BIPHENYLS (PCBs) SAMPLING AND ANALYSIS PLAN (SAP)**

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The Final SAP used to guide field work will incorporate these comments. Please contact Roger Merrick or my staff with any further questions or comments.

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